

JOSEPH P. RUSSONIELLO (CABN 44332)
United States Attorney

BRIAN J. STRETCH (CABN 163973)
Chief, Criminal Division

MATTHEW L. McCARTHY (CABN 217871)
Assistant United States Attorney

450 Golden Gate Avenue, Box 36055
San Francisco, California 94102
Telephone: (415) 436-6838
Facsimile: (415) 436-7234
Matthew.McCarthy@usdoj.gov

Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	CR No. 08-0755-SI
)	
Plaintiff,)	[PROPOSED] STIPULATED ORDER
)	CONTINUING STATUS CONFERENCE
v.)	
)	Current Hearing Date: March 27, 2009
LUIS DIAZ,)	Time: 11:00 a.m.
)	Judge: Hon. Susan Illston
Defendant.)	
)	Proposed Hearing Date: May 8, 2009
)	Time: 11:00 a.m.

The above-captioned case is currently scheduled for a status conference on Friday, March 27, 2009 at 11:00 a.m. Counsel for the parties are currently engaged in negotiations regarding a possible resolution of this case, and those negotiations require additional investigation of facts by both sides. Accordingly, the parties desire additional time to investigate the relevant facts and attempt to reach a resolution.

In addition, both counsel for the government and counsel for the defendant are set for trials in other matters during the month of April.

Therefore, the parties jointly request that the date for the status conference in this case be continued one month to Friday, May 8, 2009 at 11:00 a.m.

Further, the parties stipulate and jointly request that time be excluded from the Speedy Trial Act calculations from March 27, 2009 through May 8, 2009 for effective preparation and continuity of counsel. The exclusion of time is necessary both because of the further investigation described above and because of the intervening trials of counsel. The parties agree that the ends of justice served by granting such a continuance outweighed the best interests of the public and the defendant in a speedy trial. *See* 18 U.S.C. § 3161(h)(8)(A).

SPEEDY TRIAL ACT IMPLICATIONS

Pursuant to 18 U.S.C. § 3161, and Crim. Loc. Rule 47-2(c), there are seventy (70) days remaining before the trial in this case must commence. Taking the stipulated time exclusion

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